



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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VIA ECF

Honorable Ramon E. Reyes
United States Magistrate Judge
United States District Court
Eastern District of New York

Re: Jennifer Padilla v. City of New York, et al. 19-CV-3703 (RER)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants in the above-referenced matter. Defendants write to respectfully inform the Court that they have today disclosed IAB audio recordings of interviews with defendants Taylor and Bourne, as well as with non-parties Michael Phelan and Lieutenant Ardito. On Saturday, defendants received the audio recordings as well as additional IAB files. Defendants need to review the additional records in order to prepare them for production, and plan to turn them over to plaintiff by March 22, 2021. The parties will confer in order to schedule dates for depositions to be completed prior to March 30, 2021.

Thank you for your consideration herein.

Respectfully submitted,
s/ Omar J. Siddiqi
Omar J. Siddiqi
Senior Counsel

cc: Gabriel Paul Harvis (By ECF)
Baree N Fett (By ECF)
Attorneys for Plaintiff